Modern Slavery Policy

Purpose

This policy outlines the Napier Port's commitments and expectations in relation to modern slavery.

Modern slavery is a severe violation of human rights, encompassing practices such as forced labour, human trafficking, debt bondage, child labour, servitude, and other exploitative practices where individuals are coerced, deceived, or threatened into work against their will.

Scope

This policy applies to all employee, contractors and suppliers employed with or engaged by Napier Port. It covers all aspects of port operations including recruitment, employment, management and community engagement.

Commitment to preventing modern slavery

Napier Port is committed to preventing modern slavery and human trafficking in all areas of our business operations. Our commitments include:

- Ensuring our own operations are free from all forms of modern slavery.
- Maintaining a strong commitment to human rights.
- Complying with applicable NZ legislation.
- Conducting due diligence to identify and assess modern slavery risks in our operations and supply chains.
- Building long-term, transparent relationships with suppliers who share our values.
- Integrating modern slavery risk assessments into procurement and supplier engagement processes.
- Support suppliers in building their capacity to manage modern slavery and human rights risks.
- Promoting awareness among employees, contractors and suppliers of Napier Port about rights, protections, and reporting mechanisms.

We will not tolerate:

- Any employee, contractor or supplier of Napier Port engaging in modern slavery.
- Forced, bonded, trafficked, or child labour.

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- Withholding of identity documents, wages, or freedom of movement.
- Recruitment practices that involve deception or coercion.
- Exploitative working or living conditions.

Responsibilities and Compliance

Employees, contractors and suppliers of Napier Port are expected to:

- Read, understand, and comply with this policy.
- Refrain from engaging in modern slavery, both through their employment with Napier Port and in a personal capacity.
- Avoid engaging with entities known to practice modern slavery.
- Report any suspicions or evidence of modern slavery in accordance with this policy.
- All managers are responsible for ensuring this policy is communicated and embedded across their teams and supplier relationships.

Reporting

Napier Port provides accessible and confidential channels for reporting concerns related to modern slavery.

Reports can be made by employees, contractors, suppliers, or other workers or stakeholders of Napier Port.

Employees and contractors are required to inform their manager, senior manager, or Napier Port contact of any suspicions or evidence of modern slavery practices. This includes engagements with entities through Napier Port that are suspected of being affiliated with modern slavery. Reported incidents should be then reported to the Napier Port General Manager of People, Capability and Engagement.

Reports can also be made anonymously under Napier Port's Disclosure of Wrongdoing (Whistleblower) Policy and Procedure. This includes contacting the Chief Financial Officer, by email to whistleblower@napierport.co.nz, or by confidential hotline telephone on 0800 327 669.

If appropriate, information may be disclosed to the relevant authorities regarding any breach of human rights.

All reports will be investigated, with appropriate remedial action taken.

Breaches of this policy

Any employee or contractor who breaches this policy may face disciplinary action.

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Any supplier found to engage in, or to be of high risk of facilitating, modern slavery shall be initially engaged with a view to eliminating the practice or addressing the risk of modern slavery, which may lead to a termination of the supplier relationship if appropriate actions are not taken.

Review

This policy is subject to biennial review by the Board of Directors, or at other times as appropriate.

Related Documents

- Human Rights Act 1993
- Universal Declaration of Human Rights
- Bullying, Harassment and Discrimination Policy
- Health and Safety at Work Act 2015
- Immigration Act 2009
- Disclosure of Wrongdoing (Whistleblower) Policy and Procedure

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